

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
MRRC HOLD CO.,)	Case No. 20-12689 (MFW)
)	
Reorganized Debtor.)	Related to Docket No. 90

**CERTIFICATION OF COUNSEL REGARDING ORDER GRANTING
MOTION OF HAILEY PARKER TO PROCEED AGAINST
REORGANIZED DEBTOR AS NOMINAL DEFENDANT IN STATE COURT ACTION**

I, Karen C. Bifferato, an attorney with Connolly Gallagher LLP, as counsel to Hailey Parker (“Movant”), hereby certify the following:

1. On April 14, 2021, Movant filed a motion for an order authorizing Movant to pursue recovery on account of damages as alleged in the Complaint for Damages and Demand for Jury Trial (the “Complaint”), in which she alleged a Hostile Work Environment, Sexual Harassment, and other and related causes of action in the Superior Court of the State of California in and for the County of Orange, Case No. 30-2019-01102253-CU-OE-CJC (the “State Court Action”) as against the above-captioned Reorganized Debtor as a nominal party and as against any available insurance proceeds (Docket No. 90) (the “Motion”).¹

2. On April 28, 2021, the above-captioned Reorganized Debtor filed a limited objection to the Motion (Docket No. 97) (the “Limited Objection”).

3. On May 11, 2021, the Court held a hearing in the above-captioned case (the “Hearing”), at which it considered the Motion and the Limited Objection and the arguments made by the parties in support thereof.

¹ All capitalized terms used herein and not defined herein shall have the meanings ascribed to such terms in the Motion.

4. Attached hereto as Exhibit 1 is a copy of the order granting the Motion that was submitted with the Motion (the “Proposed Order”), and which counsel to Movant submits properly reflects the Court’s rulings made at the Hearing.

WHEREFORE, counsel to Movant respectfully requests that the Court enter the Proposed Order attached hereto as Exhibit 1 at its earliest convenience.

Dated: May 11, 2021

CONNOLLY GALLAGHER LLP

/s/ Karen C. Bifferato

Karen C. Bifferato (Bar No. 3279)
1201 N. Market Street, 20th Floor
Wilmington, DE 19801
Telephone: (302) 888-6221
Facsimile: (302) 757-7280
Email: kbifferato@connollygallagher.com

-and-

David W. Meadows, Esq.
LAW OFFICES OF DAVID W. MEADOWS
1801 Century Park East, Suite 1235
Los Angeles, CA 90067
Telephone: (310) 557-8490
Cellphone: (310) 613-9887
Email: david@davidwmeadowslaw.com

Attorneys for Hailey Parker

05607744